

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

SECURITIES AND EXCHANGE COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	
)	
ISMAEL ZARCO SANCHEZ,)	
GABRIEL ARGUELLES,)	
HECTOR AQUINO,)	
GLORIA CASTANEDA,)	
ORLIN WILIFREDO TURCIOS CASTRO,)	
CARMEN DE LA CRUZ,)	
ELIZABETH ESCOTO,)	Civil Action No 4:24-cv-939
REYNA GUIFFARO,)	
MARCO ANTONIO LEMUS,)	
DULCE OCHOA,)	
GABRIEL OCHOA,)	
JUAN PUAC,)	
MARIA SARAVIA,)	
LUIS SERRANO,)	
JULIO TAFFINDER,)	
CLAUDIA VELAZQUEZ, and)	
ROBERTO ZAVALA,)	
)	
Defendants.)	

**PLAINTIFF’S MOTION FOR ENTRY OF AGREED JUDGMENTS AS TO
DEFENDANTS ELIZABETH ESCOTO AND REYNA GUIFFARO**

Plaintiff Securities and Exchange Commission (“Commission”) files this
Unopposed Motion for Entry of Judgments as to Defendants Elizabeth Escoto (“Escoto”)
and Reyna Guiffaro (“Guiffaro”). In support of this Motion, the Commission states as
follows:

1. The Commission filed this civil action on March 14, 2024, asserting that Defendants committed violations of the federal securities laws. (*See* Doc. 1.)

2. The Commission has reached bifurcated settlements with Escoto and Guiffaro. Escoto and Guiffaro have executed written consents (the “Consents”) that set out the terms of the settlements. True and correct copies of the Consents are filed herewith as Exhibits A and B.

3. As set forth in the Consents, Escoto and Guiffaro have agreed to entry of the proposed Judgments (“Judgments”) submitted herewith as Exhibits C and D. The Judgments, among other things: (a) order permanent injunctive relief against Escoto and Guiffaro, and (b) order Escoto and Guiffaro to pay disgorgement, prejudgment interest, and civil penalties in amounts to be determined by the Court at a later date upon the Commission’s motion.

4. The Commission respectfully requests that the Court enter the Judgments.

5. Pursuant to the Consents, Defendants have agreed that the Commission may present the proposed Judgments to the Court for signature and entry without further notice (*see* Exhibit A ¶ 15 *and* Exhibit B ¶ 15).

For all of these reasons, the Court should grant this Motion, enter the proposed Judgments submitted herewith, and grant the Commission such other or further relief to which it is justly entitled.

Dated: June 25, 2025

Respectfully submitted,

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION

/s/ Tyson M. Lies

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CERTIFICATE OF CONFERENCE

I affirm that on June 23, 2025, I communicated with counsel for Escoto and Guiffaro regarding this motion. Escoto and Guiffaro are the only parties affected by the relief requested in this motion and their counsel agrees and is not opposed to the relief sought herein.

On June 25 and 26, 2025, I also conferred with counsel for all parties who have made an appearance in this matter via email. Counsel for the other Defendants confirmed that they are unopposed to the relief requested herein.

/s/Tyson M. Lies

Tyson M. Lies

CERTIFICATE OF SERVICE

I affirm that on June 25, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court for the Southern District of Texas, Houston Division, by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants.

/s/Tyson M. Lies

Tyson M. Lies